Before the
**FEDERAL COMMUNICATIONS COMMISSION**
Washington D.C., 20554

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| In the Matter of: | ) | |
| | ) | |
| Petition for Rulemaking by the Federal Law Enforcement Wireless Users Group to Promote Interoperability and Efficient Use of Allotted Spectrum for Public Safety Agencies and Other Measures to Address Communications Needs Through the Year 2010. | ) | RM- 10432 |

# Comments of the Private Radio Section of the Wireless Communications Division of the Telecommunications Industry Association

The Private Radio Section ("PRS") of the Wireless Communications Division ("WCD") of the Telecommunications Industry Association ("TIA")[1] respectfully submits the following comments on the above-captioned Petition for Rulemaking. In general, TIA's PRS supports the use of industry developed standards, and stands ready to assist the Commission should it decide to move forward to a Notice of Proposed Rulemaking in response to this Petition.

TIA is an American National Standards Institute ("ANSI")-accredited standards

[1] TIA is the leading trade association serving the communications and information technology industry, with approximately 1,100 member companies that manufacture or supply the products and services used in global communications. TIA represents the communications sector of the Electronic Industries Alliance (EIA). These comments are from the Private Radio Section of the Wireless Communications Division, where the TIA expertise on communications systems designed to meet public safety needs resides.

development organization and its product-oriented divisions and their associated engineering committees include technical experts from equipment manufacturers who serve the wireless industry as well as technical user representatives. TIA's engineering committees develop various standards and technical bulletins to address a wide range of requirements, including system performance, interference abatement, compatibility and interoperability. Within this context, TIA's PRS focuses in part on the necessary requirements to support reliable wireless communications responding to the needs of public safety entities.

## I. Background.

In its Petition for Rulemaking, the Federal Law Enforcement Wireless Users Group (FLEWUG) requests that the Commission initiate a rulemaking proceeding to address several issues related to public safety. These include:

1) Certain flexible blanket licensing mechanisms to allow State and Local access to portions of the Federal spectrum;
2) Adoption of Incident Command System (ICS) protocols to delineate procedures in an emergency;
3) Adoption of Project 25 as the public safety interoperability standard in the bands below 512 MHz, similar to action the Commission took at 700 MHz; and
4) Adoption of public safety receiver performance standards.

TIA's Private Radio Section offers the following comments on these four recommendations:

I. Flexible Blanket Licensing Mechanism for Federal Interoperability Spectrum

The PRS believes that the need for additional mechanisms that provide spectrum sharing across local/state and Federal boundaries are primarily user issues. We look forward to comments from representatives of local, state and Federal public safety user communities on the need for additional mechanisms to authorize spectrum use that transcends the FCC's and NTIA's traditional jurisdictional boundaries.

Based on close coordination with our various public safety customers over the years, we are aware that control of the spectrum to ensure its guaranteed availability for mission critical use is a significant issue. Therefore, we believe that the operational requirements of public safety users must drive whatever specific proposals the Commission advances for consideration on this issue. If local, state and Federal users concur that additional steps are needed to provide access to specific bands, we urge that Commission and NTIA proposals to provide such access minimize any bureaucracy and delay, consistent with user needs.

II. Adoption of Incident Command Protocols

FLEWUG has proposed adoption of the Incident Command System (ICS) to facilitate local and state use of Federal Interoperability spectrum. The PRS believes the users are also in the best position to comment on FLEWUG's request for adoption of the Incident Command System. We are aware that some type of pre-arranged command procedures are essential for efficient and effective communications at the incident scene. However, we will leave it to the public safety user community to comment on the appropriateness of the specific command structure FLEWUG recommends. We do question whether the FCC rules are the appropriate venue for dictating such operational procedures that are normally implemented at the local level. It is our understanding that

the incident command procedures vary from incident to incident and therefore may be difficult to incorporate into Commission rules. However, if local and state public safety users determine that there is a need for incident command procedures incorporated into Commission rules on a national basis, we pledge any assistance we can offer during a follow-up NPRM stage of this proceeding.

III. Adoption of Project 25 as the Interoperability Standard in the Bands Below 512 MHz

In its Petition, FLEWUG recommends the Commission adopt an interoperability standard in bands below 512 MHz, similar to the action taken at 700 MHz. In support of this request, FLEWUG states:

> *By supporting a single technology, the Commission accomplishes several goals simultaneously:*
>
> - *Encourages cooperation among manufacturers of equipment for the public safety community*
> - *Spurs the development of specialized features that are important to public safety users*
> - *Allows public safety organizations to take advantage of a competitive environment with multiple sources providing cost savings for purchases of conforming equipment*
> - *Eliminates the need for bridges and other stopgap measures to enable communications between agencies using different equipment.* [2]

TIA is an ANSI-accredited standards development organization and as such we fully support the development and adoption of industry-developed standards which meet user needs. Further, as stated in our 2001 Standards and Technology Annual Report:

> *When commercial products are not interoperable, the opportunity cost can be expressed in market share and inconvenience. When public safety personnel*

[2] FLEWUG Petition at page 10.

*cannot exchange information and coordinate their response, the risk is to their own lives and the lives of the citizens they protect – the cost is immeasurable.* [3]

Therefore, TIA stands ready to support our public safety customers and the Commission in considering standards such as Project 25.

The Commission will need to engage in discussion with the Public Safety user community to establish the scope (trunked, conventional, voice, data, FDMA, TDMA) and spectrum allocations for the use of any Interoperability Standard, and TIA can assist in this activity. It should be noted that with Public Safety users having different parts of the frequency spectrum, the use of "bridges and other stopgap measures" would still be required, although minimized.

IV. Adoption of Public Safety Receiver Performance Standards

FLEWUG has recommended that the Commission institute receiver performance standards in the bands below 512 MHz. This would be an expansion of recommendations by the public safety community for receiver standards in the 700 MHz band. FLEWUG appears to base its recommendation on the need to reduce interference.

The PRS notes that there is no one solution to interference; receiver standards are one element but not the only factor that determines the likelihood of interference. The National Public Safety Telecommunications Council (NPSTC) and TIA addressed this issue extensively in the context of NPSTC's petition regarding potential interference to public safety from commercial 700 MHz operations. [4] The presence or absence of

[3] TIA Standards and Technology Annual Report (STAR) 2001 at page 12.

[4] NPSTC Petition for Reconsideration, WT Docket No. 99-168, submitted March 7, 2001; TIA Notice of *Ex Parte*, WT Docket No. 99-168, November 6, 2001.

interference is also significantly impacted by the characteristics of transmitting systems and by Commission rules defining the type of operation allowed, e.g., whether base station use is allowed in a given band segment. Therefore, the PRS would caution the Commission against assuming that imposing receiver standards on public safety equipment is the primary solution for interference. However, to the extent that the Commission proposes receiver standards, we recommend referencing appropriate standards developed by TIA.

As an ANSI-accredited standards development organization, TIA develops receiver performance standards that help the industry provide products which appropriately balance performance, features and cost. For example, TIA/EIA-603[5] includes performance specifications and measurement procedures for analog products and the suite of Project 25 standards in ANSI 102 include performance specifications and measurement procedures for Project 25 digital products. [6] In addition, TIA continues key contributions on wireless systems compatibility, interference, and coverage through

[5] We note that TIA/EIA 603 is undergoing revision. That process should be completed well before the Commission would finalize any rules on this issue and therefore we would recommend that the revised version be the reference for any ultimate FCC action.

[6] ANSI 102.CAAB includes receiver performance characteristics and ANSI 102.CAAA includes related measurement procedures.

development and revision of Telecommunications System Bulletin (TSB)-88.[7]

## V. Conclusion

As the local, state and Federal public safety community and the Commission further consider the benefits of addressing the points raised by FLEWUG, TIA's Private Radio Section urges the Commission to reference ANSI-accredited industry standards in any specific proposals ultimately included in a follow-up NPRM. The TIA PRS stands ready to assist the public safety community and the Commission with any additional information regarding the Project 25 standard which has been developed and endorsed by multiple manufacturers and the public safety community. Also, while receiver standards are not the cure for interference, any receiver standards proposed should reference industry standards applicable to public safety equipment.

Respectfully submitted,

Private Radio Section
Wireless Communications Division
Telecommunications Industry Association

By: ___/s/_____

Wayne Leland
Chairman, Private Radio Section

Bill Belt
Director, Technical Regulatory Affairs

1300 Pennsylvania Avenue NW, Suite 350
Washington, DC 20004
202.383.1480

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[7] TSB-88-A, Wireless Communication Systems—Performance in Noise and Interference Limited Situations—Recommended Methods for Technology-Independent Modeling, Simulation, and Verification (June, 1999) and Addendum 1 (January, 2002).